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Attorneys for Debtor

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

In re:	)	Case No.: 23-50023 MEH
	)	Chapter 13
Y. ROGER YU,	)	
	)	<b>EX PARTE MOTION TO FILE</b>
	)	<b>DOCUMENTS UNDER SEAL</b>
Debtor.	)	<b>(Confidential Settlement Agreement)</b>
	)	Judge: M. Elaine Hammond

**TO THE HONORABLE JUDGE M. ELAINE HAMMOND, THE CHAPTER 13  
TRUSTEE'S OFFICE FOR THE NORTHERN DISTRICT OF CALIFORNIA, SAN  
JOSE DIVISION, ALL PARTIES IN INTEREST, AND THEIR RESPECTIVE  
COUNSEL(S) OR RECORD:**

Y. Roger Yu, by and through his attorney of record, FARSAD LAW OFFICE, P.C.,  
hereby files this Ex Parte Motion to File Documents Under Seal. Debtor respectfully moves the  
Court to issue an administrative order that authorizes the sealing of the following document:

**SETTLEMENT AGREEMENT AND RELEASE ("Agreement")**

This Declaration of Y. Roger Yu ("Declaration") is filed concurrently explaining the  
nature of this 100% confidential Agreement.

The Agreement contains confidential and sensitive information that might have serious,  
personal and professional negative consequences for the Debtor and Secured Creditor were it to

1 be made public. For this reason, the Debtor (as well as the Secured Creditor) hereby request that  
2 the Court grant an Order to file the above document under seal. Also, the Parties only settled the  
3 subject case on the basis that their Agreement not be made public aka Confidential. Therefore,  
4 they would like to request that the Agreement be deemed either Highly Sensitive Material or  
5 Document (HSM / HSD) or just a Confidential Document.

6  
7 Respectfully submitted,

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9 Dated: April 19, 2023

10 /s/ Arasto Farsad  
11 Arasto Farsad, Esq.  
12 Attorneys for Debtor  
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